

ANDERSON KILL P.C.

Attorneys and Counselors at Law

1251 AVENUE OF THE AMERICAS ■ NEW YORK, NY 10020
TELEPHONE: 212-278-1000 ■ FAX: 212-278-1733
www.andersonkill.com

Anna M. Piazza, Esq.
apiazza@andersonkill.com
(212) 278-1307

By eFile

April 30, 2014

Hon. Cheryl L. Pollak, U.S.M.J.
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

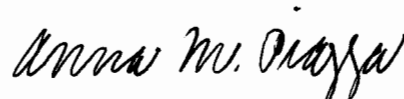
Re: The Wornick Company v. Trans-Packers Services Corp.
1:11-cv-03008 (FB)(CLP)

Dear Judge Pollak:

We represent Plaintiff, The Wornick Company ("Wornick"), in the above-referenced litigation. In accordance with Your Honor's April 23, 2014 Order, Wornick takes no position concerning the discovery dispute between Trans-Packers Services Corporation ("Trans-Packers") and Franklin Farms East, Inc. ("Franklin Farms"). Wornick is amenable to the entry of a Discovery Confidentiality Order in the form that either Trans-Packers or Franklin Farms proposes provided that Paragraph 12 is amended as follows:

12. When the ~~inadvertent or mistaken~~ disclosure of any information, document or thing protected by privilege or work-product immunity is discovered by the producing party and brought to the attention of the receiving party, the receiving party's treatment of such material shall be in accordance with Federal Rule of Civil Procedure 26(b)(5)(B). Such ~~inadvertent or mistaken~~ disclosure of such information, document or thing shall not by itself constitute a waiver by the producing party of any claims of privilege or workproduct immunity. However, nothing herein restricts the right of the receiving party to challenge the producing party's claim of privilege if appropriate within a reasonable time 21 days after receiving notice of the ~~inadvertent or mistaken~~ disclosure.

Respectfully submitted,



Anna M. Piazza

cc: Counsel of record (via ECF)